

Exhibit Q

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 SOUTHERN DIVISION
4

5 KASEY D. ALVES,

6 Plaintiff,

7 VS.

CAUSE NO.: 1:06cv912 LG-JMR

8 HARRISON COUNTY MISSISSIPPI, BY AND
9 THROUGH THE BOARD OF SUPERVISORS;
10 HARRISON COUNTY SHERIFF'S DEPARTMENT;
11 SHERIFF GEORGE PAYNE, JR.; AND,
12 HEALTH ASSURANCE, LLC.,

13 Defendants.

14 DEPOSITION

15 OF

16 WILLIAM MARTIN

17 Taken on behalf of the Plaintiff

18 1:41 p.m., Wednesday, March 12th, 2008

19 before

20 Lisa H. Brown, CSR #1166
21
22

23 COAST-WIDE REPORTERS
24 Court Reporters
25 Post Office Box 95
Biloxi, Mississippi 39533-0095
(228) 374-5066

ORIGINAL

1 out, ain't it?

2 Q. Okay. Did you ever have a chance to talk to
3 Sheriff Payne about his concerns about violence in the
4 booking area?

5 A. Prior to this or before this report?

6 Q. At any time.

7 A. Yeah, prior to this. I haven't talked to
8 sheriff after this report. I haven't talked to the
9 sheriff -- I can't even remember the last time I
10 talked to sheriff. I know I talked to the sheriff
11 about my concerns about violence in the jail prior to
12 this report over a number of years.

13 Q. What were your concerns about it?

14 A. Well, periodically the Board received
15 written complaints from inmates that they were being
16 beaten. We turned those complaints over to the
17 District Attorney's office for investigation.

18 Q. You talked to the sheriff about your
19 concerns?

20 A. Yeah.

21 Q. What was his response to your concerns?

22 A. That they were working on it. That was the
23 purpose of -- one of the purposes of the Harrison
24 County Criminal Justice Coordinating Council was to
25 try and -- everything was related back to